

# **EXHIBIT 2**

**PenFed's Answer to Interrogatory No. 25**

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

---

Nelson L. Bruce,	)	
	)	
Plaintiff,	)	
	)	
v.	)	<b>Case No. 2:22-cv-02211-BHH-MGB</b>
	)	
Pentagon Federal Credit Union, <i>et al.</i>	)	
	)	
Defendants.	)	
	)	

---

**DEFENDANT PENTAGON FEDERAL CREDIT UNION'S  
RESPONSES TO PLAINTIFF'S THIRD SET OF INTERROGATORIES**

Pentagon Federal Credit Union (“PenFed”) provides the following responses to the third set of interrogatories served by Nelson L. Bruce.

24. (incorrectly numbered as 23). Please explain in full complete detail what Assets you Pledged to Secure Borrowing as documented on your June 30, 2016 Call Report “NCUA 5300” which was filed your accountant Jay Ferrin?

**OBJECTION: PenFed objects to Interrogatory No. 24 because the information it seeks is not relevant to any of the claims or defenses asserted in this case.**

25. (incorrectly numbered as 24). You produced in discovery a document labeled “Preapproval draft” which is a copy of the draft signed by plaintiff to be negotiated and credited to the account setup for him in his name as evidenced by the draft to complete the transaction of the purchase of a vehicle which you electronically endorsed and presented to the Federal Reserve requesting a credit in the amount of \$353,252.34. Please explain in full completed detail where those credits were distributed to and why wasn’t those credits used to offset the alleged debts you

claim plaintiff allegedly owes you and why wasn't plaintiffs account credited with the remainder amount notifying him of this excess amount?

**ANSWER: PenFed did not present the document referenced in Interrogatory No. 25 to a Federal Reserve Bank, or to anybody else, to obtain “credits” to “offset” the loan PenFed issued to Nelson Bruce. Nor did PenFed receive any “credits” as described in Interrogatory No. 25. The document includes a copy of a check that PenFed issued to a car dealership to fund a vehicle loan PenFed issued to Mr. Bruce. After the car dealership negotiated the check at another financial institution, that financial institution sought reimbursement from PenFed through a Federal Reserve Bank. The check was included in a batch with other checks in the aggregate amount of \$353,252.34. The \$353,252.34, therefore, is an amount PenFed was requested to pay, rather than a “credit” it received.**

Dated: September 19, 2024.

**PENTAGON FEDERAL CREDIT UNION**

/s/ Michael A. Graziano

Michael A. Graziano (*pro hac vice*)

Sarah A. James (*pro hac vice*)

ECKERT SEAMANS CHERIN & MELLOTT, LLC

1717 Pennsylvania Avenue, N.W., Suite 1200

Washington, D.C. 20006

Telephone: 202.659.6671

Facsimile: 202.659.6699

E-mail: [mgraziano@eckertseamans.com](mailto:mgraziano@eckertseamans.com)

[sjames@eckertseamans.com](mailto:sjames@eckertseamans.com)

G. Troy Thames (Federal ID No.: 07713)  
 WILLSON JONES CARTER & BAXLEY, P.A.  
 4922 O'Hear Avenue, Suite 301  
 North Charleston, SC 29405  
 Telephone: (843) 284-0832  
 Facsimile: (843) 606-3300  
 Email: [tthames@wjclaw.com](mailto:tthames@wjclaw.com)

*Attorneys for Pentagon Federal Credit Union*

**VERIFICATION**

I verify under penalty of perjury that the foregoing interrogatory answers are true and correct to the best of my knowledge and belief.

Executed: September 19, 2024.



---

Craig Olson

**CERTIFICATE OF SERVICE**

I hereby certify that on the 19th day of September, 2024, I served the foregoing via e-mail and first class mail on:

Nelson L. Bruce  
P.O. Box 3345  
Summerville, SC 29484  
*Pro Se Plaintiff*

/s/ Michael A. Graziano  
Michael A. Graziano